

EXHIBIT 2

1 Kathleen Sullivan (SBN 242261)
kathleensullivan@quinnmanuel.com
2 QUINN EMANUEL URQUHART &
SULLIVAN LLP
3 51 Madison Avenue, 22nd Floor
New York, NY 10010
4 Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Steven Cherny (admitted *pro hac vice*)
steven.cherny@kirkland.com
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

5 Sean S. Pak (SBN 219032)
6 seanpak@quinnmanuel.com
7 John M. Neukom (SBN 275887)
8 johnneukom@quinnmanuel.com.
9 QUINN EMANUEL URQUHART &
10 SULLIVAN LLP
10 50 California Street, 22nd Floor
10 San Francisco, CA 94111
10 Telephone: (415) 875-6600
10 Facsimile: (415) 875-6700

Adam R. Alper (SBN 196834)
adam.alper@kirkland.com
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, California 94101
Telephone: (415) 439-1400
Facsimile: (415) 439-1500

11 Mark Tung (SBN 245782)
marktung@quinnemanuel.com
12 QUINN EMANUEL URQUHART &
SULLIVAN LLP
13 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
14 Telephone: (650) 801-5000
Facsimile: (650) 801-5100

Michael W. De Vries (SBN 211001)
michael.devries@kirkland.com
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, California 90071
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

16 | Attorneys for Plaintiff Cisco Systems, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

19 | CISCO SYSTEMS, INC.) CASE NO. 5:14-cv-05344-BLF

20 Plaintiff.

CASE NO. 5:14-cv-05344-BLF

21 || v.

**PLAINTIFF CISCO SYSTEMS, INC.'S
SUPPLEMENTAL OBJECTIONS AND
RESPONSES TO DEFENDANT
ARISTA NETWORKS, INC.'S
INTERROGATORY NOS. 2-10**

22 | ARISTA NETWORKS, INC.

Defendant

24

REFERENCES

1 earliest operating system (product) that contained each command expression, and the date on
 2 which each such operating system was first distributed. Pursuant to Fed. R. Civ. P. 33(d), Cisco
 3 additionally refers Arista to the documents cited in its supplemental responses to Arista's
 4 Interrogatory No. 16, including source code and documents identified by Bates number.

5 Cisco's discovery efforts in this case are ongoing, and Cisco reserves the right to further
 6 supplement this response in light of facts learned during discovery, including information
 7 regarding Arista's accused products and expert discovery.

8

9 **FOURTH SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5:**

10 Subject to and without waiver of its general and specific objections, Cisco further responds
 11 as follows:

12 Cisco incorporates by reference its responses (and all supplements and exhibits) to
 13 Interrogatory Nos. 24 and 25.

14 Insofar as Arista is asking whether Cisco took its CLI commands from third parties—for
 15 example, third parties using the same multi-word commands as those implemented by Cisco in
 16 IOS—Cisco also incorporates by reference its responses to Interrogatory Nos. 8, 16, 19 and 22.
 17 Cisco also incorporates by reference the deposition testimony of the following witnesses: Kirk
 18 Lougheed; Abhay Roy; Adam Sweeney; Anthony Li; Devadas Patil; Greg Satz; Hugh Holbrook;
 19 Phillip Remaker; Ramanthan Kavasseri; and Tong Liu.

20 Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore
 21 reserves the right to supplement this response as additional information becomes available,
 22 including information that may be the subject of expert testimony and expert discovery.

23

24 **INTERROGATORY NO. 5:**

25 Identify with specificity each copyrighted work (by copyright and registration number) that
 26 You contend Arista has unlawfully copied.

27

28

1 **RESPONSE TO INTERROGATORY NO. 5:**

2 Cisco incorporates by reference its General Objections as though fully set forth herein.
 3 Cisco further objects to this interrogatory on the grounds that it is needlessly duplicative of other
 4 interrogatories, including Interrogatory No. 2. Cisco also objects to this interrogatory as
 5 undefined, vague, ambiguous, overbroad, and unduly burdensome in its use of the terms “by
 6 copyright and registration number” and “unlawfully copied.” Cisco further objects to this
 7 interrogatory to the extent it seeks information that is protected by the attorney-client privilege,
 8 that constitutes attorney work-product, or that is protected by any other applicable privilege,
 9 protection, or immunity, including without limitation in connection with the common interest
 10 doctrine.

11 Subject to and without waiver of its general and specific objections, Cisco incorporates by
 12 reference, as if fully set forth herein, its operative complaint (and any subsequent amendments
 13 thereto) and all documents cited therein. Cisco further responds, pursuant to Fed. R. Civ. P. 33(d),
 14 that Cisco will produce documents containing information responsive to this interrogatory, which
 15 information may be obtained from the documents by Arista as easily as by Cisco. Cisco further
 16 responds that Arista has infringed at least Cisco’s copyrights in the following works:

Copyrighted Work Infringed by Arista	Registration Number(s)
Cisco IOS 11.0	TXu 1-036-057
Cisco IOS 11.1 (including supplement)	TX 5-531-435; TXu1-048-569
Cisco IOS 11.2	TXu1-036-063
Cisco IOS 11.3 (including supplement)	TXu1-036-062; TXu1-057-804
Cisco IOS 12.0 (including supplement)	TXu1-036-064; TXu1-057-805
Cisco IOS 12.1 (including supplement)	TXu1-036-066; TXu1-057-807
Cisco IOS 12.2 (including supplement)	TXu1-036-065; TXu1-057-806
Cisco IOS 12.3	TXu1-188-975
Cisco IOS 12.4	TXu1-259-162
Cisco IOS 15.0	TX 7-938-524
Cisco IOS 15.1	TX 7-938-525
Cisco IOS 15.2	TX 7-937-159
Cisco IOS 15.4	TX 7-938-341
Cisco IOS XR 3.0	TXu1-237-896
Cisco IOS XR 3.2	TXu1-270-592
Cisco IOS XR 3.3	TXu1-336-997
Cisco IOS XR 3.4	TXu1-344-750
Cisco IOS XR 3.5	TXu1-592-305

Copyrighted Work Infringed by Arista	Registration Number(s)
Cisco IOS XR 4.3	TX 7-933-364
Cisco IOS XR 5.2	TX 7-933-353
Cisco IOS XE 2.1	TX 7-937-240
Cisco IOS XE 3.5	TX 7-937-234
Cisco NX OS 4.0	TX 7-940-713
Cisco NX OS 5.0	TX 7-940-718
Cisco NX OS 5.2	TX 7-940-727
Cisco NX OS 6.2	TX 7-940-722

7 Cisco's discovery efforts in this case are ongoing, and Cisco reserves the right to further
 8 supplement this response in light of facts learned during discovery, including information
 9 regarding Arista's accused products.

10

11 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6:**

12 Subject to and without waiver of its general and specific objections, Cisco further responds
 13 as follows:

14 Cisco identifies at least the following documents and testimony as containing responsive
 15 information: Deposition Testimony of Phillip Remaker, Tong Liu, Abhay Roy, Kenneth Duda,
 16 Philip Shafer, Anthony Li, Greg Satz, and Kirk Lougheed.

17 Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore
 18 reserves the right to supplement this response as additional information becomes available,
 19 including information that may be the subject of expert testimony and expert discovery.

20

21 **INTERROGATORY NO. 6:**

22 Identify with specificity each Arista CLI Command that You contend infringes any
 23 copyrighted work identified in your response to Arista's Interrogatory No. 6, identify which
 24 work(s) it infringes, and explain in detail how each infringes.

25

26 **RESPONSE TO INTERROGATORY NO. 6:**

27 Cisco incorporates by reference its General Objections as though fully set forth herein.
 28 Cisco further objects to this interrogatory on the grounds that it is needlessly duplicative of other

1 01010072-CSI-CLI-01010347, CSI-CLI-01010348-CSI-CLI-01011702, CSI-CLI-01011703-CSI-
 2 CLI-01012066, CSI-CLI-01012067-CSI-CLI-01012355, CSI-CLI-01012356-CSI-CLI-01016323,
 3 CSI-CLI-01016330-CSI-CLI-01017570, CSI-CLI-01017571-CSI-CLI-01017816, CSI-CLI-
 4 01017817-CSI-CLI-01018442, CSI-CLI-01018443-CSI-CLI-01020174, CSI-CLI-01020175-CSI-
 5 CLI-01021530, CSI-CLI-01021531-CSI-CLI-01022293, CSI-CLI-01022294-CSI-CLI-01024115,
 6 CSI-CLI-01024116-CSI-CLI-01026323, CSI-CLI-01026324-CSI-CLI-01026761, CSI-CLI-
 7 01026762-CSI-CLI-01028393, CSI-CLI-01028394-CSI-CLI-01028687, CSI-CLI-01028688-CSI-
 8 CLI-01029723, CSI-CLI-01030760-CSI-CLI-01031005, CSI-CLI-01031006-CSI-CLI-01031136,
 9 CSI-CLI-01031137-CSI-CLI-01033756, CSI-CLI-01033757-CSI-CLI-01036302, CSI-CLI-
 10 01036303-CSI-CLI-01038556, CSI-CLI-01036303-CSI-CLI-01038556, CSI-CLI-01038557-CSI-
 11 CLI-01039330, CSI-CLI-01039331-CSI-CLI-01041106, CSI-CLI-01042983-CSI-CLI-01044384,
 12 CSI-CLI-01044385-CSI-CLI-01045982, CSI-CLI-01045983-CSI-CLI-01046296, CSI-CLI-
 13 01046297-CSI-CLI-01049592, CSI-CLI-01049593-CSI-CLI-01049801, CSI-CLI-01049802-CSI-
 14 CLI-01050104, CSI-CLI-01050105-CSI-CLI-01050634, CSI-CLI-01050635-CSI-CLI-01051202,
 15 CSI-CLI-01051203-CSI-CLI-01051418, CSI-CLI-01051419-CSI-CLI-01051565, CSI-CLI-
 16 01051566-CSI-CLI-01051605, CSI-CLI-01051606-CSI-CLI-01052137, CSI-CLI-01052138-CSI-
 17 CLI-01052341, CSI-CLI-01052342-CSI-CLI-01052547, CSI-CLI-01052548-CSI-CLI-01052797,
 18 CSI-CLI-01052798-CSI-CLI-01052993, CSI-CLI-01052994-CSI-CLI-01053577, CSI-CLI-
 19 01053578-CSI-CLI-01053763, CSI-CLI-01053764-CSI-CLI-01053821, CSI-CLI-01053822-CSI-
 20 CLI-01053932, CSI-CLI-01053933-CSI-CLI-01054026, CSI-CLI-01054027-CSI-CLI-01054122,
 21 CSI-CLI-01054123-CSI-CLI-01054235, CSI-CLI-01054236-CSI-CLI-01059274, CSI-CLI-
 22 01059275-CSI-CLI-01060223, CSI-CLI-01060224-CSI-CLI-01062264, CSI-CLI-01062265-CSI-
 23 CLI-01064584, CSI-CLI-01064585-CSI-CLI-01065152, CSI-CLI-01065153-CSI-CLI-01066352.

24 Cisco's investigation of the subject matter of this interrogatory is ongoing. Cisco therefore
 25 reserves the right to supplement this response as additional information becomes available.

26

27

28 DATED: May 27, 2016

Respectfully submitted,

1
2 /s/ Sean S. Pak
3

4 Kathleen Sullivan (SBN 242261)
5 kathleensullivan@quinnmanuel.com
6 QUINN EMANUEL URQUHART &
7 SULLIVAN LLP
8 51 Madison Avenue, 22nd Floor
9 New York, NY 10010
10 Telephone: (212) 849-7000
11 Facsimile: (212) 849-7100
12

13 Sean S. Pak (SBN 219032)
14 seancp@quinnmanuel.com
15 John M. Neukom (SBN 275887)
16 johnneukom@quinnmanuel.com.
17 QUINN EMANUEL URQUHART &
18 SULLIVAN LLP
19 50 California Street, 22nd Floor
20 San Francisco, CA 94111
21 Telephone: (415) 875-6600
22 Facsimile: (415) 875-6700
23

24 Mark Tung (SBN 245782)
25 marktung@quinnmanuel.com
26 QUINN EMANUEL URQUHART &
27 SULLIVAN LLP
28 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

1 Steven Cherny (admitted *pro hac vice*)
2 steven.cherny@kirkland.com
3 KIRKLAND & ELLIS LLP
4 601 Lexington Avenue
5 New York, New York 10022
6 Telephone: (212) 446-4800
7 Facsimile: (212) 446-4900
8

9 Adam R. Alper (SBN 196834)
10 adam.alper@kirkland.com
11 KIRKLAND & ELLIS LLP
12 555 California Street
13 San Francisco, California 94104
14 Telephone: (415) 439-1400
15 Facsimile: (415) 439-1500
16

17 Michael W. De Vries (SBN 211001)
18 michael.devries@kirkland.com
19 KIRKLAND & ELLIS LLP
20 333 South Hope Street
21 Los Angeles, California 90071
22 Telephone: (213) 680-8400
23

1 Facsimile: (213) 680-8500

2 *Attorneys for Plaintiff Cisco Systems, Inc.*

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1

2 **PROOF OF SERVICE**

3 I hereby certify that, at the date entered below and per the agreement of the parties, I
 4 caused a true and correct copy of the foregoing to be served by transmission via electronic mail,
 5 made available to counsel at the email addresses below:

6 Juanita R. Brooks
 7 brooks@fr.com
 8 Fish & Richardson P.C.
 9 12390 El Camino Real
 10 San Diego, CA 92130-2081

Brian L. Ferrall
 blf@kvn.com
 Michael S. Kwun
 mkwun@kvn.com
 David J. Silbert
 djs@kvn.com

11 Kelly C. Hunsaker
 12 hunsaker@fr.com
 13 Fish & Richardson PC
 14 500 Arguello Street, Suite 500
 15 Redwood City, CA 94063

16 Robert Van Nest
 rvannest@kvn.com
 17 Keker & Van Nest LLP
 18 633 Battery Street
 19 San Francisco, CA 94111-1809

20 Ruffin B. Cordell
 21 cordell@fr.com
 22 Lauren A. Degnan
 23 degnan@fr.com
 24 Michael J. McKeon
 25 mckeon@fr.com
 26 Fish & Richardson PC
 27 1425 K Street NW
 28 11th Floor
 Washington, DC 20005

Susan Chreighton
 screighton@wsgr.com
 Scott Andrew Sher
 ssher@wsgr.com
 Wilson Sonsini Goodrich Rosati
 1700 K Street
 Washington, DC 20006

29 I declare under penalty of perjury that the foregoing is true and correct. Executed on May
 30 2016, at San Francisco, California.

31 */s/ Catherine R. Lacey*

32 Catherine R. Lacey